

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|-------------------------|---|-----------------------|
| In re: |) | Case No. 10 - 15099 |
| |) | |
| KIEBLER RECREATION, LLC |) | Chapter 11 |
| |) | |
| Debtor. |) | Judge Randolph Baxter |
| |) | |

**OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO
MOTION OF THE HUNTINGTON NATIONAL BANK FOR RELIEF FROM THE
AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d) TO CONTINUE
FORECLOSURE ACTION AND EXERCISE RIGHTS WITH REGARD TO CASH
COLLATERAL**

The Official Committee of Unsecured Creditors (the "Committee"), by and through its undersigned counsel, hereby objects to the *Motion Of The Huntington National Bank For Relief From The Automatic Stay Pursuant To 11 U.S.C. § 362(d) To Continue Foreclosure Action And Exercise Rights With Regard To Cash Collateral* filed November 8, 2010 [Docket No. 320] (the "Motion"), respectfully stating as follows:

1. The Committee joins in the Objection filed by the Debtor to the Motion.
2. Motion fails to demonstrate that the Debtor's assets are not maintaining their value, that Huntington's liens against such assets are not adequately protected, that the Debtor lacks equity or that the assets are not necessary for an effective reorganization.
3. The Motion fails to establish cause for relief from the automatic stay.
4. The Motion should not be granted except upon proper notice and an opportunity for an evidentiary hearing.
5. The Committee reserves the right to amend and supplement this Objection.

WHEREFORE, the Committee respectfully requests that the Motion be denied and the Court grant the Committee such other and further relief as is just and equitable.

Dated: November 16, 2010

Respectfully submitted,

/s/ Daniel A. DeMarco

Daniel A. DeMarco (0038920)

Christopher B. Wick (0073126)

HAHN LOESER & PARKS LLP

200 Public Square, Suite 2800

Cleveland, Ohio 44114

Telephone: (216) 621-0150

Facsimile: (216) 241-2824

E-mail: dademarco@hahnlaw.com

cwick@hahnlaw.com

*Attorneys for the Official Committee of Unsecured
Creditors for Kiebler Recreation, LLC*

CERTIFICATE OF SERVICE

A copy of the foregoing *Objection Of The Official Committee Of Unsecured Creditors To Motion of The Huntington National Bank For Relief From The Automatic Stay Pursuant To 11 U.S.C. § 362(D) To Continue Foreclosure Action And Exercise Rights With Regard To Cash Collateral* has been served upon each of the parties indicated on the attached Service List by regular United States mail, postage prepaid, or, if applicable by ECF, on this 16th day of November 2010.

/s/ Daniel A. DeMarco
*One of the Attorneys for the Official Committee of
Unsecured Creditors for Kiebler Recreation, LLC*

SERVICE LIST

The following is the list of **parties** who are currently on the list to receive e-mail notice/service for this case and who were served by the Court's electronic noticing system:

- Kathleen M. Bennett kbennett@bsk.com, khourihan@bsk.com; kdoner@bsk.com
 - Lawrence C Bolla lbolla@quinnfirm.com,
mboni@quinnfirm.com; dcornelius@quinnfirm.com; mmiller@quinnfirm.com; npagliari@quinnfirm.com
 - Carrie M Brosius cmbrosius@vorys.com, mborr@vorys.com
 - Brian J. Butler bbutler@bsk.com, jheisler@bsk.com; kdoner@bsk.com
 - Daniel A DeMarco dademarco@hahnlaw.com, hlpcr@hahnlaw.com
 - Stephen A. Donato sdonato@bsk.com,
kdoner@bsk.com; tayers@bsk.com; tvanetti@bsk.com
 - Robert C Folland rob.folland@thompsonhine.com
 - Joseph D. Frank jfrank@fgllp.com, ccarpenter@fgllp.com
 - Joseph F. Gula jgula@kmgslaw.com,
jgula@roadrunner.com; mwernicki@kmgslaw.com
 - Mark L. Hankin mhankin@hankinmazel.com
 - Kenneth C Johnson kjohnson@bricker.com,
rdelsignore@bricker.com; jearley@bricker.com
-
- Philip E Langer planger@porterwright.com, cruehl@porterwright.com
 - John P. Lennon jplennon@trialadvocates.com
 - Ingrid S. Palermo ipalermo@bsk.com,
kdoner@bsk.com; sheffner@bsk.com; tvanetti@bsk.com
 - Drew T Parobek dtparobek@vorys.com
 - United States Trustee (Registered address)@usdoj.gov
 - Curtis L. Tuggle curtis.tuggle@thompsonhine.com
 - Andrew L. Turscak andrew.turscak@thompsonhine.com
 - Mark A. Weintraub Mark.Weintraub@ThompsonHine.com
 - Linda E White linda.white@ag.ny.gov
 - Christopher B. Wick cwick@hahnlaw.com, hlpcr@hahnlaw.com

- Joseph Zagraniczny jzagraniczny@bsk.com,
kdoner@bsk.com;amasica@bsk.com;tvanetti@bsk.com

The following is the list of **parties** who are **not** on the list to receive e-mail notice/service for this case and who were served by United States Mail, postage prepaid:

Ciuni&Panichi Inc
25201 Chagrin Blvd
#200
Beachwood, OH 44122

Guy C Fustine
120 W 10th St
Erie, PA 16501

RSM McGladrey, Inc.
One S. Wacker Drive
Suite 800
Chicago, IL

Andrew Vara, Esq.
Ronna G. Jackson, Esq.
Howard M. Metzenbaum U.S. Courthouse
201 Superior Avenue
Cleveland, OH 44114